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 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado corporation,  
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LIMITED, a Hong Kong company;  
 SHENZHEN GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual, ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTVPAD LTD. COMPANY d/b/a  
 NEWTVPAD.COM a/k/a TVPAD USA, a  
 Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a E-  
 DIGITAL, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 MMM (AJWx)**

**EX PARTE APPLICATION TO  
 ADVANCE HEARING ON  
 PLAINTIFFS' MOTION TO  
 HOLD DEFENDANT CREATE  
 NEW TECHNOLOGY (HK)  
 LIMITED IN CONTEMPT;  
 DECLARATION OF CARLA A.  
 McCAULEY AND EXHIBITS A  
 THROUGH C**

[Proposed Order concurrently  
 submitted]

Current Hearing: November 9, 2015  
 at 10:00 a.m.

Courtroom: 780

Action Filed: March 13, 2015

1 **PLEASE TAKE NOTICE** that pursuant to Local Rule 7-19, Plaintiffs China  
 2 Central Television, China International Communications Co., Ltd., TVB Holdings  
 3 (USA), Inc., and DISH Network L.L.C. (collectively “Plaintiffs”) hereby request  
 4 through the instant Ex Parte Application that Plaintiffs’ pending Motion to Hold  
 5 Defendant Create New Technology (HK) Limited (“CNT”), in Contempt (the  
 6 “Contempt Motion”) now set for November 9, 2015 at 10:00 a.m., be advanced and  
 7 specially set for an emergency hearing date in mid-September, or the earliest possible  
 8 date practical on the Court’s calendar.

9 Good cause exists to grant this application because the first hearing date listed  
 10 as available on the Court’s civil motion calendar when Plaintiffs filed their Contempt  
 11 Motion on August 26, 2015 was November 9, 2015. That hearing date is still over  
 12 ten weeks away as of the date of the filing of the instant Ex Parte. Plaintiffs’  
 13 Contempt Motion seeks coercive sanctions against CNT to ensure the immediate  
 14 compliance by CNT with this Court’s Order granting preliminary injunction entered  
 15 June 11, 2015, and which CNT has entirely ignored, causing Plaintiffs’ ongoing and  
 16 irreparable injury. As set forth below and in Plaintiffs’ pending Contempt Motion, it  
 17 is crucial that Plaintiffs’ Contempt Motion be heard as soon as possible.

18 On May 28, 2015, the Court entered default against Defendant CNT.  
 19 Declaration of Carla A. McCauley (“McCauley Decl.”) at ¶5. Notwithstanding the  
 20 fact that default has been entered against CNT, Plaintiffs have arranged for personal  
 21 service of CNT at its registered offices in Hong Kong with notice of the instant ex  
 22 parte application and the pending Contempt Motion. *See* McCauley Decl. ¶5 and Ex.  
 23 B. Plaintiffs separately gave notice to counsel for the remaining Defendants who  
 24 have been served and who have entered appearances in the instant action. McCauley  
 25 Decl. ¶7 Ex. C.

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1 This Application is based upon the attached Memorandum of Points and  
2 Authorities, the Declaration of Carla A. McCauley and accompanying exhibits, the  
3 pleadings and files in this action, and such other argument and evidence as may be  
4 presented at any hearing on the Application.

5  
6 DATED: August 25, 2015

DAVIS WRIGHT TREMAINE LLP  
CARLA A. McCAULEY  
ROBERT D. BALIN (*pro hac vice*)  
LACY H. KOONCE, III (*pro hac vice*)  
SAMUEL BAYARD (*pro hac vice*)  
GEORGE WUKOSON (*pro hac vice*)

7  
8  
9  
10  
11 By \_\_\_\_\_ /s/Carla A. McCauley

12 Carla A. McCauley

13 Attorneys for Plaintiffs  
14 CHINA CENTRAL TELEVISION; CHINA  
15 INTERNATIONAL COMMUNICATIONS CO.,  
16 LTD.; TVB HOLDINGS (USA), INC.; AND  
17 DISH NETWORK L.L.C.  
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## MEMORANDUM OF POINTS AND AUTHORITIES

### I. INTRODUCTION AND STATEMENT OF RELEVANT FACTS

On June 11, 2015, the Court entered its Order granting Plaintiffs' Motion for Preliminary Injunction against, among other Defendants, Create New Technology (HK) Limited ("CNT"). Doc. No. 98. Acknowledging in its Findings of Fact in support of that Order that CNT markets and sells a TVpad device that uses various applications or "Apps" to infringe Plaintiffs' copyrighted television programming (the "Infringing TVpad Apps"), and that Plaintiffs are likely to show contributory and vicarious copyright infringement by CNT (Doc. No. 97 at p. 7, 16 through 20), the Court entered its Order immediately enjoining CNT from transmitting Plaintiffs' copyrighted programming, authorizing or hosting the Infringing TVpad Apps, advertising the TVpad Apps, or distributing any TVpad device that connects to or downloads the Infringing TVpad apps or Plaintiffs' copyrighted programming. Doc. No. 98 at p. 3 through 4.

CNT has taken no steps whatsoever to comply with the Court's Order in the two months since the Order was entered. CNT was given notice of the Court's Order through multiple avenues, including personal service on CNT's registered offices in Hong Kong, and yet, CNT continues with business as usual notwithstanding the Court's Order. In brazen violation of the Order, CNT continues to make the Infringing TVpad Apps available through the TVpad device; sells, continues to market and promote the Infringing TVpad Apps; and continues to facilitate direct infringement of Plaintiffs' copyrighted television programming. In fact, as fully detailed in Plaintiffs' Contempt Motion, CNT has intensified its marketing efforts by touting the ability of its TVpad device to provide Plaintiffs' copyrighted programming free of charge through the Infringing TVpad Apps in several post-injunction website posts and email advertisements. *See* Contempt Motion at 8. Such flouting of this Court's Order by a party that made a strategic decision to default in this action, rather than be held accountable for its massive copyright infringement,

1 cannot be tolerated. Plaintiffs therefore respectfully request that this contempt of  
 2 court be addressed earlier than the noticed motion deadline of November 9, 2015,  
 3 which was the first available date for a hearing on the Court's motion calendar.  
 4 Instead, Plaintiffs' respectfully request that a hearing be held on the earliest available  
 5 date convenient to the Court to address through coercive sanctions CNT's flagrant  
 6 disregard of this Court's Order.

## 7 **II. ARGUMENT**

8 This Court has held that *ex parte* relief is appropriate if:

9 (1) the moving party's cause will be irreparably prejudiced if the underlying  
 10 motion is heard according to regular noticed motion procedures; and

11 (2) the moving party is without fault in creating the crisis that requires *ex parte*  
 12 relief, or that the crisis occurred as a result of excusable neglect.

13 *See Mission Power Eng'g. Co. v. Continental Cas. Co.*, 883 F. Supp. 488, 495 (C.D.  
 14 Cal. 1995). Plaintiffs meet both tests.

15 First, Plaintiffs' irreparable injury in the face of CNT's blatant refusal to abide  
 16 by the Court's preliminary injunction Order is indisputable. As the Court  
 17 acknowledged in its Findings of Fact in support of its Order, Plaintiffs have already  
 18 experienced and are likely to experience yet additional irreparable injury in the  
 19 absence of injunctive relief. Doc. No. 97 at p. 21 through 23. Plaintiffs filed their  
 20 Motion for Preliminary Injunction on March 16, 2015. The Court heard that Motion  
 21 on June 8, 2015, after which CNT promptly received notice of the Order. McCauley  
 22 Decl. Ex. A. Notwithstanding the fact that the Court granted Plaintiffs' motion and  
 23 gave Plaintiffs' their requested relief in its entirety, CNT's failure to comply with  
 24 that Order has only magnified the irreparable injury of Plaintiffs that this Court  
 25 already acknowledged when entering its Order. A further delay of ten weeks, until  
 26 this Contempt Motion can be heard on a regularly noticed hearing date, will only  
 27 increase Plaintiffs' injury.

1        Second, Plaintiffs are without fault in creating the need for ex parte relief.  
 2 Plaintiffs have been diligently investigating the scope of CNT's contempt of Court,  
 3 including through involved forensic analysis of the origins and infringing nature of  
 4 CNT's streaming of Plaintiffs' copyrighted programming. Plaintiffs' requested  
 5 hearing date of November 9, 2015 is well beyond the date ordinarily provided for a  
 6 regularly noticed motion under these procedures. Local Rule 6-1. This application is  
 7 necessary because the Court's calendar did not list at time of filing an available  
 8 hearing date for a noticed motion prior to November 9, 2015. McCauley Decl. ¶ 4.  
 9 All earlier dates are marked as closed on the Court's calendar. Hence, Plaintiffs  
 10 could not have set their Contempt Motion to be heard prior to November 9 2015.

11        Finally, Plaintiffs have proposed that the hearing on this matter be advanced to  
 12 a date in mid-September given the emergency nature of the requested relief.  
 13 Expediting the Contempt Motion to the first practical date on this Court's calendar,  
 14 including to a date in mid-September, is particularly appropriate, because Plaintiffs'  
 15 Contempt Motion involves more than just Plaintiffs' irreparable injury, but a party  
 16 openly flouting an Order of this Court. Further delay in addressing CNT's conduct  
 17 will only encourage CNT to continue to ignore this Court's Order. Moreover, the  
 18 ordinary schedule for a regularly noticed motion need not apply to a defendant such  
 19 as CNT that has already defaulted in this action, particularly given the emergency  
 20 nature of the requested relief. As such, Plaintiffs have requested a hearing date in  
 21 mid-September, to the extent such scheduling is practical to the Court's calendar.

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**III. CONCLUSION**

For all the reasons stated above, Plaintiffs respectfully request that the Court grant their Ex Parte Application and advance the hearing date on Plaintiffs' Contempt Motion to a date in mid-September, or the first available date that the Court may hear the Contempt Motion.

DATED: August 25, 2015

DAVIS WRIGHT TREMAINE LLP  
CARLA A. McCAULEY  
ROBERT D. BALIN (*pro hac vice*)  
LACY H. KOONCE, III (*pro hac vice*)  
SAMUEL BAYARD (*pro hac vice*)  
GEORGE WUKOSON (*pro hac vice*)

By: /s/Carla A. McCauley

Carla A. McCauley  
Attorneys for Plaintiffs  
CHINA CENTRAL TELEVISION; CHINA  
INTERNATIONAL COMMUNICATIONS CO.,  
LTD.; TVB HOLDINGS (USA), INC.; AND  
DISH NETWORK L.L.C.

**DECLARATION**



## DECLARATION OF CARLA A. MCCAULEY

I, Carla A. McCauley, declare as follows:

1. I am licensed to practice law before all the courts in the State of California and am admitted to the United States Court of Appeals for the Ninth Circuit. I am a partner at Davis Wright Tremaine LLP, counsel for Plaintiffs in the above-entitled matter. I submit this Declaration in support of Plaintiffs' Ex Parte Application to Advance the Hearing on Plaintiffs' Motion to Hold Defendant Create New Technology (HK) Limited ("CNT") in Contempt of Court (the "Contempt Motion"). I have personal knowledge of the facts contained herein, and, if called upon as a witness, I could and would testify competently about these facts, except for those matters stated expressly upon information and belief, which matters are believed to be true.

2. Plaintiffs filed their Motion for Preliminary Injunction on March 16, 2015. The hearing on that Motion was held on June 8, 2015. The Court entered its Order granting Plaintiffs' requested preliminary injunction on June 11, 2015.

3. In addition to the electronic notice of the Court's Order that CNT's counsel of record received upon entry of the Court's Order, Plaintiffs also personally served CNT at its registered offices in Hong Kong through Plaintiffs' local solicitors in Hong Kong. A true and correct copy of the proof of service of CNT of the Court's Order and Findings of Fact is attached hereto as **Exhibit A**.

4. On August 25, 2015, prior to finalizing Plaintiff's Contempt Motion for service, I confirmed the closed dates on the Court's calendar. The first available hearing date was November 9, 2015. All earlier dates were marked closed on the Court's calendar.

5. On May 28, 2015, the Court entered default against CNT. Notwithstanding CNT's default in this action, I requested that Plaintiffs' solicitors in Hong Kong give notice to CNT through personal service of the instant ex parte application and Contempt Motion at CNT's registered offices in Hong Kong. A true

1 and correct copy of my email, requesting that Plaintiffs' solicitors personally serve  
2 CNT with this Ex Parte, and Plaintiffs' solicitor's response, is attached hereto as  
3 **Exhibit B.** The address at which Plaintiffs provided personal notice of the ex parte  
4 and Motion is the last address listed for purposes of contacting CNT by CNT's  
5 counsel of record prior to their withdrawal (*See* Document No. 56-2 at ¶14), and is  
6 also the office CNT has registered as its official address under the laws of Hong  
7 Kong.

8 6. Prior to filing the instant Ex Parte, a copy of the Proof of Service,  
9 executed by a solicitor from Vivien Chan & Co. shall be included with this Ex Parte,  
10 attesting to personal service on CNT at its registered offices in Hong Kong in  
11 accordance with service procedures under the Hong Kong companies ordinance.

12 7. On August 25, 2015, I sent an email to Jeff Lee, counsel for Defendant  
13 Honghui Chen, Francis Ryu, counsel for Defendant ClubTVpad and Bennett Wong,  
14 and Mark Clark, counsel for Asha Media and Amit Bhalla of the ex parte notice.  
15 None of the other defendants indicated they would be opposing the ex parte. A true  
16 and correct copy of my email to counsel is attached hereto as **Exhibit C.**

17 I declare under penalty of perjury under the laws of the United States of  
18 America that the foregoing is true and correct.

19 Executed August 25, 2015 at Los Angeles, California.

20 /s/Carla A. McCauley

21 Carla A. McCauley  
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## **EXHIBIT A**

CARLA A. McCAULEY (State Bar No. 223910)  
 carlamccauley@dwt.com

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 ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

CHINA CENTRAL TELEVISION, a China  
 company; CHINA INTERNATIONAL  
 COMMUNICATIONS CO., LTD., a China  
 company; TVB HOLDINGS (USA), INC., a  
 California corporation; and DISH  
 NETWORK L.L.C., a Colorado limited  
 liability company,

Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
 LIMITED, a Hong Kong company; HUA  
 YANG INTERNATIONAL TECHNOLOGY  
 LTD., a Hong Kong company; SHENZHEN  
 GREATVISION NETWORK  
 TECHNOLOGY CO. LTD., a China  
 company; CLUB TVPAD, INC., a California  
 corporation; BENNETT WONG, an  
 individual; ASHA MEDIA GROUP INC.  
 d/b/a TVPAD.COM, a Florida corporation;  
 AMIT BHALLA, an individual;  
 NEWTPAD LTD CO. a/k/a TVPAD USA,  
 a Texas corporation; LIANGZHONG ZHOU,  
 an individual; HONGHUI CHEN d/b/a e-  
 Digital, an individual; JOHN DOE 1 d/b/a  
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
 JOHN DOE 5 d/b/a GANG YUE; JOHN  
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
 d/b/a GANG TAI WU XIA; and JOHN DOES  
 8-10,

Defendants.

Case No.  
**CV 15-1869 MMM (AJWx)**

**PROOF OF SERVICE BY HAND  
 DELIVERY**

**PROOF OF SERVICE BY HAND DELIVERY**

I am employed and qualified as a solicitor in Hong Kong Special Administrative Region of the People's Republic of China, I am over the age of 18 and not a party to the within action. My business address is 57/F Cheung Kong Center, 2 Queen's Road Central, Hong Kong.

On June 17, 2015, I served the following document(s):

1. PRELIMINARY INJUNCTION

2. FINDINGS OF FACT AND CONCLUSIONS OF LAW SUPPORTING ENTRY OF PRELIMINARY INJUNCTION

on the below parties in this action or proceeding, by personally delivering a copy thereof, enclosed in a sealed envelope(s), to the addressee(s) at the following address(es):

**Create New Technology (HK) Limited, Room D, 10/F, Tower A, Billion Centre, 1 Wang Kwong Road, Kowloon Bay, Kowloon, Hong Kong**

**Hua Yang International Technology Limited, Room 1103, Hang Seng Mongkok Building, 677 Nathan Road, Mongkok, Kowloon, Hong Kong**

Executed on June 18, 2015, at Hong Kong Special Administrative Region of the People's Republic of China.

☒ Federal I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I have served the above referenced documents at the direction of a member of the bar of this Court.

Hung Kin Wing  
Print Name

  
Signature

**GZJ KDK'D''**

## McCauley, Carla

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**From:** Owen Tse <owentse@vcclawservices.com>  
**Sent:** Monday, August 24, 2015 10:51 PM  
**To:** McCauley, Carla  
**Cc:** Ken Hung  
**Subject:** RE: China Central Television/service request

Dear Carla,

We confirm that we can arrange the service as required. We will conduct the search on CNT and get back to you on whether there is any update on its address soon.

Best regards,  
Owen Tse  
Partner

**VIVIEN CHAN & CO.**

SOLICITORS & NOTARIES  
HONG KONG | BEIJING

**Hong Kong Office:**  
57/F Cheung Kong Center,  
2 Queen's Road Central  
T: (852) 2533 2162  
F: (852) 2530 9627  
E: [owentse@vcclawservices.com](mailto:owentse@vcclawservices.com)  
W: [www.vcclawservices.com](http://www.vcclawservices.com)

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**WARNING:**

From time to time, our spam scanners may eliminate legitimate email from clients. If your email contains important instructions, please ensure that we acknowledge receipt of those instructions.

---

**From:** McCauley, Carla [<mailto:CarlaMcCauley@dwt.com>]  
**Sent:** Tuesday, August 25, 2015 7:24 AM  
**To:** Owen Tse  
**Subject:** China Central Television/service request

Dear Owen,

Consistent with our prior communications on this subject, Plaintiffs anticipate having ready for service by August 26, 2015 Hong Kong time the complete Motion to Hold CNT in Contempt of Court, and accompanying Ex Parte Application to advance the hearing date on the Contempt Motion.

Can you please confirm that your firm stands ready to have a solicitor personally serve the documents listed in the attached draft proof of service on CNT's registered offices in Hong Kong? I expect to have the documents finalized and ready to email to you late in the day August 25, 2015 PST, which means I anticipate you will receive them in time to execute service first thing in the morning on August 26, 2015 Hong Kong time.

Secondly, can you please reconfirm that CNT's registered office address remains unchanged from that which is reflected in the attached draft proof of service? If there are any changes, please advise in a responsive email.

If you have any questions, kindly let me know.

Regards,  
Carla

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Anchorage | Bellevue | **Los Angeles** | New York | Portland | San Francisco | Seattle | Shanghai | Washington, D.C.



## **EXHIBIT C**

## McCauley, Carla

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**From:** McCauley, Carla  
**Sent:** Tuesday, August 25, 2015 1:07 PM  
**To:** mark@traverselegal.com; Francis Ryu (Francis@ryulaw.com); Tim Wang (twang@nilawfirm.com) (twang@nilawfirm.com); jflee@ltpacificlaw.com  
**Cc:** Koonce, Lance; Balin, Robert  
**Subject:** China Central Television/Notice of Ex Parte Application CV 15-1869MMM

Dear counsel,

Tomorrow, Plaintiffs will file an ex parte application with the Court to advance the hearing date on Plaintiffs' Motion to Hold Create New Technology (HK) in Contempt of Court. The Contempt Motion will be set for November 9, 2015 at 10:00 a.m., but we will be requesting that the Court advance the hearing date on this emergency motion to a date convenient to the Court in mid-September.

Please advise if you intend to oppose this ex parte application.

Regards,  
Carla

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